

POLREP #3 (REVISED - FORMALLY NO. 4)

WALNUT AVENUE LEAD SITE

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

I. SITUATION (1200 HRS, TUESDAY, NOVEMBER 22, 1994)

- A. CONSENT ORDER TO PERFORM EXTENT OF CONTAMINATION STUDY AND REMOVAL OF LEAD CONTAMINATED SOILS/MATERIALS HAS BEEN DRAFTED AND SENT TO CYCLE SYSTEMS, INC.
- B. OSC TO VISIT SITE TO VERIFY CURRENT SITE CONDITIONS IN ORDER TO FINALIZE CONSENT ORDER.
- C. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO THE WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- D. PERSONNEL ON SITE: EPA-1, CYCLE SYSTEMS-1, ERM-1

II. ACTIONS TAKEN

- A. OSC DODD MOBED TO SITE TO CONDUCT ON-SITE VISIT TO VERIFY CURRENT CONDITIONS AND TO DISCUSS PRP PROPOSED SAMPLING PLAN.
- B. THE SITE IS IN AN INDUSTRIAL/COMMERCIAL SETTING. RESIDENTIAL HOUSING IS LOCATED ACROSS THE ROANOKE RIVER FROM THE SITE, APPROXIMATELY 100 YARDS FROM THE SITE.
- C. OF THE THREE AREAS IDENTIFIED AS HAVING ELEVATED LEVELS OF LEAD, ONLY ONE AREA WAS WITHIN THE FACILITY'S PERIMETER FENCE. TWO AREAS OF CONCERN WERE BETWEEN THE FENCELINE AND THE ROANOKE RIVER. OSC DODD OBSERVED A CHAIN LINK FENCE SURROUNDING THE FACILITY, HOWEVER SEVERAL BREECHES IN THE FENCE WERE NOTED. TWO OF THE BUILDINGS ON THE SITE ARE EQUIPPED WITH BURGLAR ALARMS, MONITORED BY A LOCAL SECURITY SERVICE.
- D. IN GENERAL, THE AREA BETWEEN THE FACILITY'S FENCELINE AND THE ROANOKE RIVER APPEARS TO HAVE RECEIVED FILL. A PILE (APPROXIMATELY 10' x 10' x 3') OF FILL APPEARING TO CONTAIN PAINT PIGMENT WAS FOUND ON THE NORTHEAST CORNER OF THE SITE ADJACENT TO THE WAREHOUSE.
- E. ERM'S PROPOSED SAMPLING PLAN ONLY ADDRESSES LIMITED SAMPLING IN THE IDENTIFIED AREAS OF CONCERN.

### III. FUTURE PLANS

- A. REQUIRE REPAIR OF EXISTING PERIMETER FENCE AND ADDITION OF FENCE FROM EXISTING FENCELINE TO ROANOKE RIVER AT SITE BOUNDARIES TO PRECLUDE EASY ACCESS TO CONTAMINATED AREAS OF THE SITE.
- B. REQUIRE ADDITIONAL SAMPLING OF AREAS WHICH HAVE RECEIVED FILL AS WELL AS A MORE GENERAL SAMPLING PLAN TO DETERMINE EXTENT OF CONTAMINATION AT THE SITE.
- C. COORDINATE WITH CYCLE SYSTEMS AND EPA REGIONAL COUNSEL IN THE SIGNING OF THE CONSENT ORDER.
- D. OSC TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH STATE AND LOCAL OFFICIALS.

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JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV